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23 Attorneys for Plaintiff

24 **UNITED STATES DISTRICT COURT**
25 **DISTRICT OF NEVADA**

26 NAVAJO HEALTH FOUNDATION – SAGE
27 MEMORIAL HOSPITAL, INC. (doing
28 business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
PLAINTIFF’S THIRD AMENDED
COMPLAINT**

(SECOND REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until September 19, 2022, to respond to Defendant’s motion to dismiss (ECF No. 201) Plaintiff’s Third Amended Complaint (ECF No. 192). Presently, Plaintiff’s response to the motion to dismiss is due on September 16, 2022. This is Plaintiff’s second request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. Plaintiff’s counsel, Paul Padda, has communicated to undersigned defense counsel that the response to Defendants’ motion to dismiss the Third Amended Complaint has been completed but one additional business day is needed for his co-counsel to review the document. Currently, Kathleen Bliss, Esq. is in Reno, Nevada representing a client in a federal jury trial. Mr. Padda’s other co-counsel are currently reviewing the response but will need an additional day to submit comments and have any proposed additions incorporated into the final submission.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time of one business day, to and until September 19, 2022, to permit Plaintiff to file its response to the pending dispositive motion is appropriate under the circumstances.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda

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Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
6 *Counsel for all named Defendants*

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

7 Dated: September 16, 2022

Dated: September 16, 2022

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12 **IT IS SO ORDERED.**

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14 Dated this 16 day of September, 2022

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Gloria M. Navarro, District Judge
18 UNITED STATES DISTRICT COURT
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